

Mind-Alliance Systems, LLC submits the following updated recommendations regarding Private Sector Emergency Preparedness (PS-Prep) Standards

1) Information Sharing and Communication Plan Requirement

- a) In order to be certified as having met the Private Sector Emergency Preparedness Standard, an organization shall develop, document, and maintain Information Sharing and Communication Plans ("ISC Plans").
- b) ISC Plans shall serve as part of, or as annexes to the organization's general All-Hazards emergency preparedness plan, and its plans for specific types of incidents.
- c) ISC Plans shall specify information sharing and communication procedures which, at a minimum:
 - i) Identify all key participants deemed critical for the effective execution of the organization's emergency preparedness plan and for achieving its objectives. "Key participants," means all internal and external roles, positions and partners who must send or receive information related to the execution of the plan. External participants include business partners and government agencies at local, state, federal and international levels, and the media.
 - ii) Specify, for each key participant, the essential information sharing and communication actions for both internal communication within the organization and external communications required to support tasks, actions, and decisions that need to be taken by the participant. An "essential information sharing and communication action" is information sharing and communication without which a task cannot be executed effectively.
 - iii) Identify the message content that needs to be sent, requested, and received by each participant.
 - iv) Identify the communication mechanism (system, tools, network) to be utilized for the communication.
 - v) Identify critical requirements regarding the timeliness of the information sharing and communication, for both normal and emergency or other special situations.
- d) ISC Plans shall be reported to senior organizational leadership.

2) ISC Plan Development, Coordination, Evaluation and Exercise

- a) For quality control, the plans and their implementation should be evaluated at least one annually by outside experts.
- b) The organization shall develop, coordinate, evaluate and exercise the ISC plan in coordination with internal stakeholders and external stakeholders, at least once annually.
- c) The organization shall document the processes and tools by which it develops its ISC Plans and manages relationships and communication procedures with external partners

uses to assess the ISC Plan and the capability required to execute it.

3) Continuous Updating and Improvement

- b) The organization shall designate a person responsible for developing a plan to audit the completeness of the ISC Plan. The person shall recommend ways to correct the shortcoming identified in the IC Plan Review Process and in exercises.
- c) The organization shall use its knowledge of information sharing issues to improve network and doctrine design. Planners and analysts shall proactively look for those links where the flow of information is most likely to break down, and identify the underlying reasons why these issues may occur so that safeguards can be built. The analysts shall regularly assess the flow of information to identify the risk of issues such as gaps, bottlenecks, single-points of failure and non-compliance with regulation and policy. The analysts shall prepare a written plan for mitigating and remediating the information sharing and communication issues, which shall be reported to organizational leadership.
- d) The Organization shall assess its information sharing capability through tabletop and other exercises designed to measure and assess the completeness, speed, resilience and policy compliance of information sharing, and to mitigate the risks of preventable failures in communication. In assessing its information sharing and communication capability, the organization shall consider new standards, and best-practice models.

4) Third-Party Assessment

- a) On an annual basis, the organization shall engage third party experts experienced in preparing information sharing plans that meet this standard to carry out an annual assessment of its ISC Plan, the ISC Plan development process, and findings from any reviews or exercises that were conducted.
- b) The ISC Plan Reviewers shall identify the individuals from the organization and its external partners involved in the ISC planning process.
- c) The ISC Plan Reviewers shall validate that the individuals with roles specified in the ISC Plan have received training in their information sharing and communication requirements and confirm that they are familiar with their roles and responsibilities under the plan. Participants are expected to be capable of demonstrating that they know whom to contact and how to make contact, and what information needs to be communicated. It is desirable that they also know *how* the information they provide is used and how it influences actions and decisions.
- d) Findings from the third party assessment shall be reported to senior organizational management. These assessments could be shared, as appropriate with the relevant government agencies.
- e) If findings from the assessment indicate shortcomings in the ISC Plan and the ability of the organization to execute it, the organization shall revise its communication procedures, provide remedial training, and deploy relevant systems to support improvements in information sharing and communication.
- f) The Organization shall update its ISC Plan to maintain its utility in light of new threats, new

5) Government Contracting Incentive

- a) The federal government shall not contract with an organization to provide services or systems to support a continuity of government or continuity of operations mission if it has not been certified as having met the PS-Prep standards.
- b) An organization that has been certified as having met IS-PREP standards shall receive preferential scoring in competitive bidding for government contracts.

6) Executive Order

- a) We recommend that the President consider issuing an executive order mandating that federal agencies adopt, and be certified as meeting, the PS-Prep standard.